

EXHIBIT J

THE CITY OF REVERE, MASSACHUSETTS

281 Broadway
Revere, MA 02151



Thomas G. Ambrosino
Mayor

OFFICE OF THE CITY SOLICITOR

Paul Capizzi
Walter H. Porr, Jr.
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June 12, 2006

VIA FACSIMILE ONLY - 617-227-9231

James S. Dilday, Esq.
Grayer & Dilday, LLP
27 School Street, Suite 400
Boston, MA 02108

Re: Pechner-James, et al., v. City of Revere, et al.

Dear Attorney Dilday:

While I realize that your letter of June 10, 2006, states that "as far as the meet and confer requirements are concerned, consider them accomplished and that we cannot agree on you receiving additional deposition dates beyond those that were previously ordered by the court," I write nonetheless because the Omnibus Discovery Order gave my clients 2 and ½ days with each plaintiff. As my letter of June 8, 2006, indicated, the Federal Rules of Civil Procedure define a deposition day as 7 hours. Thus, my clients were given 17.5 hours per plaintiff. With respect to Sonia Fernandez, by my calculation, I have used approximately 10.5 hours over three days (5/12, 5/16 & 6/2). Thus, I am entitled to at least 1 additional day of deposition time with Sonia Fernandez. Likewise, with respect to Terri Pechner, by my calculation, I have used approximately 13.5 hours over three days (5/5, 5/25 & 6/7). Thus, I am entitled to at least an additional 4 hours of deposition time with Terri Pechner.

In light of the foregoing, do I understand your letter correctly that each Plaintiff will honor their Court ordered obligation for the remaining hours, or are you saying that neither of them will complete the allotted time set by the Court. If they intend to complete their deposition obligation as per court order, then we need some dates. If they do not intend to honor their Court ordered obligation for the remaining hours, then I need to know that as well.

James S. Dilday, Esq.
June 12, 2006
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Please call me at your earliest possible convenience so that we may move forward accordingly.

Sincerely,

A handwritten signature in black ink, appearing to read "W. H. Porr, Jr.", with a long, sweeping flourish extending to the right.

Walter H. Porr, Jr.
Assistant City Solicitor

cc: Michael Akerson, Esq., via fax 508-754-7220